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7	**Designated Attorney for Personal Service**	
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9	Las Vegas, NV 89149	
10	IN THE UNITED STATES DISTRICT COURT	
11	FOR THE DISTRICT OF NEVADA	
12	DIAHANN POZOS-MALETTA,	Case No. 2:20-cv-00242-JCM-NJK
13	Plaintiff,	DEFENDANT TRANS UNION LLC'S
14	v.	FIFTH UNOPPOSED MOTION FOR
15	EQUIFAX INFORMATION SERVICES,	EXTENSION OF TIME TO REPLY TO PLAINTIFF'S RESPONSE TO
	LLC, TRANSUNION, LLC, WESTERN FEDERAL CREDIT UNIONS and	DEFENDANT'S MOTION TO DISMISS
16	NORDSTROM/TD BANK USA,	
17	Defendants.	
18	Defendant Trans Union LLC ("Trans Union"), by counsel, files its Fifth Unopposed	
19	Motion for Extension of Time to Reply to Plaintiff's Response to Defendant's Motion to Dismiss	
20	and would respectfully show the Court as follows:	
21	I. <u>BACKGROUND</u>	
22	1. On February 4, 2020, Plaintiff Diahann Pozos-Maletta ("Plaintiff") filed ar	
23	original complaint ("Complaint"). In response, Trans Union filed its Motion to Dismiss	
24	Plaintiff's Complaint, Dkt. 5.	
25	2. Plaintiff then filed a Response in Opposition to Trans Union LLC's Motion to	
26	Dismiss Complaint on March 30, 2020, Dkt 22. Trans Union's deadline to reply to Plaintiff'	
27	Response is June 1, 2020.	
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## II. RELIEF REQUESTED

- 3. Trans Union seeks a 14-day extension of the deadline to file its Reply to Plaintiff's Response.
- 4. Good cause exists for Defendant's extension as Trans Union needs additional time to review the numerous arguments made in Plaintiff's 11-page Response, to review the case law cited therein, and to prepare its Reply. In addition, Plaintiff and Defendant TransUnion have been actively engaged in settlement discussions and believes there is a good chance the matter will be imminently resolved without the need to incur additional costs and expenses. Settlement negotiations have required additional time as a result of COVID-19 and the related delays caused as all parties adjust to working remotely, which include but are not limited to difficulty accessing necessary documents. The Plaintiff and Defendant are close to settlement and do not anticipate any further request for an extension. This is Defendant's fourth request.
- 5. Plaintiff is not opposed to the requested extension and no party will be prejudiced thereby. The extension is not requested for delay and will not impact any other deadline in the Court's Scheduling Order.

Wherefore, Trans Union respectfully requests this Court issue an Order extending the deadline for Trans Union to file its Reply to Plaintiff's Response to June 15, 2020.

Dated this 1<sup>st</sup> day of June 2020.

/s/ David H. Krieger

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Counsel for Trans Union LLC

IT IS SO ORDERED June 3. 2020

Xellus C. Mahan UNITED STATE DISTRICT JUDGE

HONORABLE JAMES C. MAHAN

1 **CERTIFICATE OF SERVICE** 2 I hereby certify that on the 1st day of June 2020, I electronically filed DEFENDANT TRANS UNION LLC'S FIFTH UNOPPOSED MOTION FOR EXTENSION OF TIME 3 4 TO REPLY TO PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION TO DISMISS 5 with the Clerk of the Court using the CM/ECF system which will then send a notification of such to the following counsel of record: 6 7 Shawn W. Miller Jeremy J. Thompson smiller@kriegerlawgroup.com jthompson@clarkhill.com 8 David H. Krieger Clark Hill PLLC dkrieger@hainesandkrieger.com 3800 Howard Hughes Parkway, Suite 500 9 Krieger Law Group, LLC Las Vegas, NV 89169 2850 W. Horizon Ridge Pkwy., Suite 200 10 (702) 862-8300 Henderson, NV 89052 (7020 862-8400 Fax 11 (702) 848-3855 Counsel for Equifax Information Services, Counsel for Plaintiff LLC 12 Brett P. Ryan Tyson E Hafen 13 Brett.Ryan@UnifyFCU.com tehafen@duanemorris.com 7935 W. Sahara Ave., Suite 201 14 Duane Morris LLP Las Vegas, NV 89117 100 North City Pkwy., Suite 1560 15 (310) 783-5957 Las Vegas, NV 89106 Counsel for Western Federal Credit Union (702) 868-2655 16 (702) 385-6862 Fax Counsel for Nordstrom and TD Bank USA 17 18 /s/ Jennifer Bergh 19 JENNIFER BERGH 20 21 22 23 24 25 26 27 28